



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

DEC 31 2014

The Original Bradford Soap Works, Inc.
c/o Richard A. Sherman, Esq.
Edwards Wildman Palmer, LLP
2800 Financial Plaza
Providence, RI 02903

Re: Request for Information Pursuant to Section 104 of CERCLA for the Centredale Manor
Restoration Project Superfund Site

Dear Mr. Sherman:

This letter seeks your cooperation in providing information and documents relating to the environmental conditions at, and cleanup of, the Centredale Manor Restoration Project Superfund Site in North Providence, Rhode Island ("Site").

The United States Environmental Protection Agency ("EPA") is investigating the release or threatened release of hazardous substances, pollutants, and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to undertake or finance that cleanup.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request **within fourteen (14) days** of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to thirty-seven thousand five hundred dollars (\$37,500) for each day of non-compliance.

Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Your response to this Information Request should be mailed to:

U.S. Environmental Protection Agency
Anna Krasko, Remedial Project Manager
Office of Site Remediation & Restoration
5 Post Office Square, Suite 100
Mail Code 0SRR07-1
Boston, MA 02109-3912

If you have general questions concerning this Information Request, please contact Man Chak Ng, Senior Enforcement Counsel, U.S. Environmental Protection Agency, Region 1 Office of Environmental Stewardship, at (617) 918-1785 or ng.manchak@epa.gov.

Due to the seriousness of the problem at the Site and the legal ramifications of your failure to respond properly, EPA strongly encourages you to give this matter your immediate attention and to respond to this Information Request within the time specified above.

Thank you for your cooperation in this matter.

Sincerely,



Michael Jasinski, Chief
NH/RI Superfund Section
Office of Site Remediation & Restoration

Enclosure

cc. Man Chak Ng, Esq., EPA Office of Environmental Stewardship
Anna Krasko, EPA Remedial Project Manager

INFORMATION REQUEST FOR
CENTREDALE MANOR RESTORATION PROJECT SUPERFUND SITE

* **Period Being Investigated:** 1952 to 1971 *

* * *

In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as "Respondent," "identify," "waste," and "asset" used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.
- This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent

NOTE: All questions in this section refer to the present time unless otherwise indicated.

a. For each person answering these questions on behalf of Respondent, provide:

i. full name;

ii. title;

iii. business address;

iv. business telephone number and fax number; and

v. email address.

2. Respondent's Operations

Note: All questions in this section refer to the period being investigated (1952-1971), unless otherwise indicated, and to Respondent's facility at 200 Providence Street in West Warwick, Rhode Island. If Respondent's operations at the facility varied during the period being investigated, and such variation is of relevance in the response to a specific question, answer the question for all varied scenarios.

a. In Respondent's Spill Prevention, Control and Countermeasure Plan, Bradford Soap Works, 200 Providence Street, West Warwick, Rhode Island 02893, October 1998 ("1998 SPCC Plan"), there is a mention of "Tall Oil" in Table 2:

Table 2

**INTERIOR ABOVEGROUND STORAGE TANKS
Original Bradford Soap Works - West Warwick, Rhode Island**

Revised October 1998

TANK CONTENTS	CAPACITY (gal)	TANK MATERIAL	AGE (yrs)	TANK ID	COMMENT
Tall Oil	4,095	Aluminum	30	8	In 1st floor area

- i. Describe whether, how, and when Tall Oil was delivered to Respondent's facility, including:
 - a) The type of container(s) which held Tall Oil as Tall Oil was delivered to the facility;
 - b) The quantities and frequency of Tall Oil deliveries; and
 - c) The sources of the Tall Oil deliveries.
 - ii. Describe whether, how, and when Tall Oil was collected and stored at Respondent's facility, including:
 - a) The type of container(s), tank(s), or other vessel(s) in which Tall Oil was stored; and
 - b) The location(s) where such container(s), tank(s), or other vessel(s) were stored.
 - iii. Describe whether, how, and when Tall Oil was used in the operations at Respondent's facility.
 - iv. Describe the annual quantities of Tall Oil usage.
 - v. Describe whether and how the container(s) storing/holding Tall Oil were disposed of or recycled.
- b. In the October 6, 1972 Congressional Record concerning the U.S. Food and Drug Administration's ("FDA") ban on products containing hexachlorophene (118 Cong. Rec. 34333-34336), there is a "List of Products Containing Hexachlorophene" prepared by FDA. Included in this list were products containing hexachlorophene that were manufactured by Respondent, each with concentrations of hexachlorophene of 1%:

LIST OF PRODUCTS CONTAINING HEXACHLOROPHENE

State and manufacturer (city)	Product	Conc. (percent) HCP
Rhode Island:		
Claffin (Providence).....	Surgi Hex.....	2.5
Original Bradford Soap Works (West Warrick)...	Weis Deodorant Soap.....	1
	Red and White Deodorant Soap.....	1
	Luxury Deodorant Soap.....	1
	Sweet Life Deodorant Soap.....	1
	Hy-Top Deodorant Soap.....	1
	Pro-Tec Deodorant Soap.....	1
	Stop & Shop Deodorant Soap.....	1
	Ice-O-Derm Soap.....	1
	Bonne Bell 10-06 Soap.....	1
	Pub Soap.....	1
	Up-Beat Soap.....	1
	Wanda Woodward Passage Soap.....	1

i. Describe whether, how, and when hexachlorophene was used in the manufacture of the soap products identified in the 1972 FDA list, including:

a) The annual quantities of hexachlorophene usage.

ii. Describe whether, how, and when hexachlorophene was delivered to Respondent's facility, including:

a) The type of container(s) that hexachlorophene was stored in when hexachlorophene was delivered to the facility, such as fiber drums, open head metal drums, and close head metal drums (in addition, identify if the containers were lined with plastic liners);

b) The quantities and frequency of hexachlorophene deliveries; and

c) The sources of the hexachlorophene deliveries.

iii. Describe whether and how hexachlorophene was collected and stored at Respondent's facility, including:

a) The type of container(s), tank(s), or other vessel(s) in which hexachlorophene was stored; and

b) The location(s) where such container(s), tank(s), or other vessel(s) were stored.

- iv. Describe whether and how the container(s), tank(s), or other vessel(s) storing/holding hexachlorophene, including any plastic liners, were disposed of or recycled.
- v. Describe whether and how hexachlorophene was manufactured at Respondent's facility, including:
 - a) A description of the chemicals used in manufacturing hexachlorophene and their annual quantities, including:
 - 1) The type of container(s) which held these chemicals as these chemicals were delivered to the facility;
 - 2) The quantities and frequency of deliveries of these chemicals; and
 - 3) The sources of the deliveries of these chemicals;
 - b) A description of whether and how the chemicals used in manufacturing hexachlorophene were collected and stored at Respondent's facility, including:
 - 1) The type of container(s) in which the chemicals used in manufacturing hexachlorophene were stored; and
 - 2) The location(s) where such container(s) were stored; and
 - c) A description of whether and how the container(s) storing/holding the chemicals used in manufacturing hexachlorophene were disposed of or recycled.
- vi. Describe any waste stream(s) from Respondent's operations that could have contained hexachlorophene, including:
 - a) How such waste material was stored and disposed of.
- c. Describe whether any materials used by Respondent in the production of its products were delivered and/or stored in fiber drums including:
 - i. The quantity of such fiber drums; and

- ii. A description of whether and where such fiber drums, and/or their contents, were disposed of or recycled.

3. Compliance with This Request

- a. Describe all sources reviewed or consulted in responding to this request, including but not limited to:

- i. The names of all individuals consulted;
- ii. The current job title and job description of each individual consulted;
- iii. The job title and job description during the period being investigated of each individual consulted;
- iv. Whether each individual consulted is a current or past employee of Respondent;
- v. The names of all divisions or offices of Respondent for which records were reviewed;
- vi. The nature of all documents reviewed;
- vii. The locations where those documents reviewed were kept prior to review; and
- viii. The location where those documents reviewed are currently kept.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

_____ and that the foregoing is complete, true, and correct.
Respondent

Executed on _____, 20__

Signature

Type Name

Title [if any]

SITE DESCRIPTION

The Centredale Manor Restoration Project Superfund Site ("Site") is located in North Providence, Rhode Island. It consists of two parcels, 2072 and 2074 Smith Street (Plat 14, Lots 200 and 250, encompassing approximately 9 acres) ("Source Area"), as well as surface water, sediment and floodplain areas of the Woonasquatucket River (the "River") from Route 44 southerly to the Allendale Dam and further below to the Lyman Mill Dam, including all contaminated areas within this area as well as any other locations to which contamination has come to be located.

Prior to 1936, the Site properties occupied by Centredale Worsted Mills, a woolens mill. Atlantic Chemical Company, a chemical manufacturer, began operating on a portion of the Site in approximately 1943. Atlantic Chemical Company changed its name in 1953 to Metro-Atlantic, Inc. and continued to operate until the late 1960s or early 1970s. New England Container Company, Inc. operated an incinerator-based drum reconditioning facility on a portion of the Site from 1952 until about 1971. A major fire in 1972 destroyed most of the structures at the Site.

Analysis of soil, sediment, floodplain soil, surface water, biota and groundwater samples at the Site shows high levels of hazardous substances, pollutants or contaminants, including dioxin (including 2,3,7,8-tetrachlorodibenzo-p-dioxin ("2,3,7,8-TCDD")), polychlorinated biphenyls ("PCBs"), metals, pesticides, volatile organic compounds ("VOCs"), and semi-volatile organic compounds ("SVOCs") (including polycyclic aromatic hydrocarbons ("PAHs")).

EPA has conducted time critical removal, non-time critical removal, and remedial activities at the Site. EPA conducted Remedial Investigation activities between 1999 and 2005. The Feasibility Study ("FS"), which evaluates potential cleanup options for the Site, was initiated in 2004, and an Interim Final FS report was issued in 2010. An addendum to the Interim Final FS was issued in 2011, followed by a Proposed Plan identifying EPA's preferred cleanup approach for public comment. On September 28, 2012, EPA issued its selected cleanup plan, formally referred to as the Record of Decision, for the Site.

INFORMATION REQUEST INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated, unless the question specifically states otherwise. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to \$37,500 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.
8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.

9. Confidential Information. The information requested herein must be provided even though you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as "trade secret" or "proprietary" or "company confidential." Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within seven (7) days of receiving this Information Request.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for

which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST

CONTRACTOR

CONTRACT NUMBER

ASRC Management Services, Inc.
Subcontractor: Booz Allen Hamilton
Effective: April 19, 2008

Contract No.: EP-S1-06-02

Booz, Allen & Hamilton
Subcontractor to ASRC
Effective: January 1, 2008

Contract No.: EP-W-05-052

TechLaw, Inc.
Effective: 7/12/99

GSA Contract No.: GS-10F-0168J

Toeroek Associates, Inc.
Subcontractor, TechLaw, Inc.
Effective: May, 2004

Contract No.: EP-S2-04-03

James Kerr and Associates, LLC
Effective: September 4, 2003

Contract No.: GS-10F-0272S

Industrial Economics, Inc.
Effective: March 22, 2002

DOJ Contract No.: 02-C-0437
(Subcontract 022-02-S-0110)

Eisenstein Malanchuk LLP
Effective: September 1, 2007

Contract No.: EP-W-07-079

INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations ("CFR"), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Respondent" shall mean the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents, and any predecessor or successor corporations or companies.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information. "Document" shall include but not be limited to:
 - (a) writings of any kind, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
 1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
 2. letter, correspondence, fax, telegram, telex, Email;
 3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
 4. agreement, contract, and the like;
 5. log book, diary, calendar, desk pad, journal;
 6. bulletin, circular, form, pamphlet, statement;
 7. report, notice, analysis, notebook;
 8. graph or chart; or
 9. copy of any document.
 - (b) microfilm or other film record, photograph, or sound recording on any type of device;
 - (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:
 1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and
 2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

- (d) attachments to or enclosures with any document as well as any document referred to in any other document.
3. The term “identify” or “provide the identity of” means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with job title, position or business; and (d) the person's social security number.
4. The term “identify” or “provide the identity of” means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g. corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.
5. The term “identify” or “provide the identity of” means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.
6. The term “material” or “materials” shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.
7. The terms “the period being investigated” and “the relevant time period” shall mean the period being investigated as specified on the first page of the Information Request Questions.
8. The terms “the Site” shall mean and include the property on or about the Centredale Manor Restoration Project Superfund Site, which is more fully described in the enclosed Site Description.
9. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.
10. The term “asset” shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.
11. The term “real estate” shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

END OF THE INFORMATION REQUEST

THANK YOU FOR YOUR ASSISTANCE IN THIS MATTER

